

EXHIBIT A

Z:\B&R 1 JPR\Clients\Ober And Associates\Fee Petition and Fee Agreement\FEE Petition v1

EXHIBIT B

OBER WAGE CASE
ATTORNEY/PARA LEGAL HOURS NOT CHARGED IN FEE PETITION

ATTORNEY / PARA LEGAL	Time SPENT	Slip Value	Date	Description
(AE) BROTMAN	1.50	\$337.50	11/07/13	Draft demand letter
(AC) GALER	0.70	\$206.50	12/03/13	Review edits to complaint
(AC) GALER	0.50	\$147.50	12/03/13	Review edited complaint, discuss with Brian
(AC) GALER	0.50	\$147.50	12/04/13	Review and discuss edits to complaint w/BDB
(AE) BROTMAN	0.75	\$168.75	12/04/13	Meet with AEG re: Complaint. Revise Complaint
(AE) BROTMAN	1.33	\$299.25	01/03/14	Review Summons received from Court. Prepare Summons and Complaint for service. Phone correspondence with area service companies
(AE) BROTMAN	0.50	\$112.50	01/15/14	Phone and email correspondence with client re: retaliation for fisa claim.
(AE) BROTMAN	0.60	\$135.00	01/17/14	Phone correspondence with client re: potential retaliation claims
(AA) RUBINSKY	0.20	\$95.00	01/15/14	Possible retaliation in Ober Complaint
(S) Siligrini	0.60	\$66.00	01/27/14	Created discovery binder and worked on pleadings binder
(S) Siligrini	0.38	\$41.80	01/29/14	Worked on Pleadings Binder
(S) Siligrini	0.48	\$52.80	02/03/14	Worked on Binders
(S) Siligrini	0.42	\$46.20	02/07/14	Worked on Pleadings Binder
(S) Siligrini	0.67	\$73.70	02/07/14	Worked on Pleadings Binder
	7.63	1592.50		

EXHIBIT C

OBER WAGE CASE
PLAINTIFF'S HOURS SORTED BY ATTORNEY/PARALEGAL

ATTORNEY / PARA LEGAL	Date	Time Spent	Description
(AA) RUBINSKY	11/19/13	0.50	Meet with client
(AA) RUBINSKY	12/05/13	0.50	Review Complaint
(AA) RUBINSKY	01/14/14	0.10	Email: Activity In Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Certificate of Service
(AA) RUBINSKY	01/14/14	0.30	Review issue with client on Potential Retaliation by Defendant.
(AA) RUBINSKY	01/30/14	0.70	Prepare - Confidential Settlement Offer on Fees and Costs
(AA) RUBINSKY	01/30/14	0.10	Review email from Paul R. Ober & Associates Wage Case - Confidential Settlement Offer on Fees and Costs
(AA) RUBINSKY	02/04/14	0.20	Review: Ober and Associates- Updated Acceptance and proposed order
(AA) RUBINSKY	02/04/14	0.10	Offer to settle fees in Paul R. Ober & Associates Wage Case - Confidential Settlement Offer on Fees and Costs
(AA) RUBINSKY	02/06/14	0.10	Review Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Judgment
(AA) RUBINSKY	02/06/14	0.10	Review Activity In Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Order Referring Case to Magistrate Judge-Settlement
(AA) RUBINSKY	02/07/14	0.10	Review Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Order
(AC) GALER	12/02/13	2.70	Review and edit complaint,lexis research
(AC) GALER	02/06/14	0.50	Review fee petition, discuss edits with BDB
(AE) BROTMAN	10/04/13	1.20	Initial Intake with client.
(AE) BROTMAN	10/15/13	1.30	Interview Client and witness.
(AE) BROTMAN	10/15/13	2.30	Review and analysis of wage and hour documents provided by client
(AE) BROTMAN	10/28/13	0.70	Prepare wage and hour spreadsheet, work with paralegal.
(AE) BROTMAN	10/31/13	2.40	Review and analyze timecard and paystub data. Create calculation document, review calculations
(AE) BROTMAN	11/14/13	1.25	Prepare correspondence to client..
(AE) BROTMAN	11/19/13	2.12	Meet with Client and JPR. Update calculation document to include new wage and hour data provided by client
(AE) BROTMAN	11/22/13	5.00	Review documents, draft complaint, review and edit complaint
(AE) BROTMAN	12/04/13	3.30	Meet w/ AEG re: claims and facts of case. Redraft and Revise Complaint
(AE) BROTMAN	12/05/13	1.50	Revise Complaint, send to client for review
(AE) BROTMAN	12/09/13	0.10	Phone correspondence with client confirming client's review and understanding of complaint
(AE) BROTMAN	12/12/13	0.12	Review email from client.
(AE) BROTMAN	12/20/13	1.00	Prepare Complaint Cover, Cert. of Service, Opt. In forms, Research
(AE) BROTMAN	12/30/13	2.50	Draft Designation Form and Case Management Form. Finalize Complaint and all supplemental documents for filing with Eastern District Clerk
(AE) BROTMAN	12/30/13	0.17	Email to client advising them of status of filing complaint.

OBER WAGE CASE
PLAINTIFF'S HOURS SORTED BY ATTORNEY/PARALEGAL

(AE) BROTMAN	01/06/14	1.30	Research on Preliminary Approval for Collective Action Cert.
(AE) BROTMAN	01/06/14	0.17	Review email from client re: appropriate communication with Ober during pendency of legal action. Respond with advice
(AE) BROTMAN	01/13/14	0.08	Review email from client re: potential retaliatory harassment. Respond with advice.
(AE) BROTMAN	01/14/14	0.67	Phone call from client - Advise on right not to be retaliated against for filing wage complaint
(AE) BROTMAN	01/23/14	1.50	Prepare first draft of Request for Production of Documents
(AE) BROTMAN	01/28/14	1.17	Review Answer, Offer of Judgment and documents provided by Defendant. Phone Correspondence with Client to discuss Offer.
(AE) BROTMAN	01/28/14	1.50	Phone correspondence with client re: Offer of Judgment. Email and Written correspondence with opposing counsel, advising acceptance of Offer.
(AE) BROTMAN	02/04/14	0.33	Finalize and e-file Notice of Acceptance. Submit to opposing counsel via email and first class mail
(AE) BROTMAN	02/04/14	1.58	Research on post-offer of judgment fee petition. Draft motion for attorneys fees. Begin draft of memo in support
(AE) BROTMAN	02/05/14	0.50	Draft acceptance of offer and proposed order
(AE) BROTMAN	02/05/14	2.50	Continue research on post judgment offer fee petitions. Begin draft of fee petition
(AE) BROTMAN	02/06/14	3.00	Draft, review, edit Fee Petition
(AE) BROTMAN	02/07/14	1.40	Redraft and revise fee petition
(AE) BROTMAN	02/11/14	1.30	Draft Settlement Conference Memo
(AE) BROTMAN	02/11/14	0.75	Phone correspondence with client re: Ober failing to provide her with health coverage memo and paperwork. Advise client. Memo to file.
(AE) BROTMAN	02/11/14	1.00	Revise fee petition, motion, and settlement memo
(S)Siligrini	02/11/14	2.50	Enter data from wage and hour documents provided by client into spreadsheet under supervision of BDB

52.21

EXHIBIT D

OBER WAGE CASE
PLAINTIFF'S HOURS BY DATE

ATTORNEY / PARA LEGAL	Date	Time Spent	Description
(AE) BROTMAN	10/04/13	1.20	Initial Intake with client.
(AE) BROTMAN	10/15/13	1.30	Interview Client and witness.
(AE) BROTMAN	10/15/13	2.30	Review and analysis of wage and hour documents provided by client
(AE) BROTMAN	10/28/13	0.70	Prepare wage and hour spreadsheet, work with paralegal.
(AE) BROTMAN	10/31/13	2.40	Review and analyze timecard and paystub data. Create calculation document, review calculations
(AE) BROTMAN	11/14/13	1.25	Prepare correspondence to client..
(AA) RUBINSKY	11/19/13	0.50	Meet with client
(AE) BROTMAN	11/19/13	2.12	Meet with Client and JPR. Update calculation document to include new wage and hour data provided by client
(AE) BROTMAN	11/22/13	5.00	Review documents, draft complaint, review and edit complaint
(AC) GALER	12/02/13	2.70	Review and edit complaint, lexis research
(AE) BROTMAN	12/04/13	3.30	Meet w/ AEG re: claims and facts of case. Redraft and Revise Complaint
(AA) RUBINSKY	12/05/13	0.50	Review Complaint
(AE) BROTMAN	12/05/13	1.50	Revise Complaint, send to client for review
(AE) BROTMAN	12/09/13	0.10	Phone correspondence with client confirming client's review and understanding of complaint
(AE) BROTMAN	12/12/13	0.12	Review email from client.
(AE) BROTMAN	12/20/13	1.00	Prepare Complaint Cover, Cert. of Service, Opt. In forms, Research
(AE) BROTMAN	12/30/13	2.50	Draft Designation Form and Case Management Form. Finalize Complaint and all supplemental documents for filing with Eastern District Clerk
(AE) BROTMAN	12/30/13	0.17	Email to client advising them of status of filing complaint.
(AE) BROTMAN	01/06/14	1.30	Research on Preliminary Approval for Collective Action Cert.
(AE) BROTMAN	01/06/14	0.17	Review email from client re: appropriate communication with Ober during pendency of legal action. Respond with advice
(AE) BROTMAN	01/13/14	0.08	Review email from client re: potential retaliatory harassment. Respond with advice.
(AA) RUBINSKY	01/14/14	0.10	Email: Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Certificate of Service
(AA) RUBINSKY	01/14/14	0.30	Review issue with client on Potential Retaliation by Defendant.
(AE) BROTMAN	01/14/14	0.67	Phone call from client - Advise on right not to be retaliated against for filing wage complaint
(AE) BROTMAN	01/23/14	1.50	Prepare first draft of Request for Production of Documents
(AE) BROTMAN	01/28/14	1.17	Review Answer, Offer of Judgment and documents provided by Defendant. Phone Correspondence with Client to discuss Offer.
(AE) BROTMAN	01/28/14	1.50	Phone correspondence with client re: Offer of Judgment. Email and Written correspondence with opposing counsel, advising acceptance of Offer.
(AA) RUBINSKY	01/30/14	0.70	Prepare - Confidential Settlement Offer on Fees and Costs

OBER WAGE CASE
PLAINTIFF'S HOURS BY DATE

(AA) RUBINSKY	01/30/14	0.10	Review email from Paul R. Ober & Associates Wage Case - Confidential Settlement Offer on Fees and Costs
(AA) RUBINSKY	02/04/14	0.20	Review: Ober and Associates- Updated Acceptance and proposed order
(AA) RUBINSKY	02/04/14	0.10	Offer to settle fees in Paul R. Ober & Associates Wage Case - Confidential Settlement Offer on Fees and Costs
(AE) BROTMAN	02/04/14	0.33	Finalize and e-file Notice of Acceptance. Submit to opposing counsel via email and first class mail
(AE) BROTMAN	02/04/14	1.58	Research on post-offer of judgment fee petition. Draft motion for attorneys fees. Begin draft of memo in support
(AE) BROTMAN	02/05/14	0.50	Draft acceptance of offer and proposed order
(AE) BROTMAN	02/05/14	2.50	Continue research on post judgment offer fee petitions. Begin draft of fee petition
(AA) RUBINSKY	02/06/14	0.10	Review Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Judgment
(AA) RUBINSKY	02/06/14	0.10	Review Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Order Referring Case to Magistrate Judge-Settlement
(AC) GALER	02/06/14	0.50	Review fee petition, discuss edits with BDB
(AE) BROTMAN	02/06/14	3.00	Draft, review, edit Fee Petition
(AA) RUBINSKY	02/07/14	0.10	Review Activity in Case 5:13-cv-07634-JKG CHAMURAS v. PAUL R. OBER & ASSOCIATES et al Order
(AE) BROTMAN	02/07/14	1.40	Redraft and revise fee petition
(AE) BROTMAN	02/11/14	1.30	Draft Settlement Conference Memo
(AE) BROTMAN	02/11/14	0.75	Phone correspondence with client re: Ober failing to provide her with health coverage memo and paperwork. Advise client. Memo to file.
(AE) BROTMAN	02/11/14	1.00	Revise fee petition, motion, and settlement memo
(S)Sillgrinl	02/11/14	2.50	Enter data from wage and hour documents provided by client into spreadsheet under supervision of BDB

52.21

EXHIBIT E

OBER WAGE CASE
PLAINTIFF'S COSTS

DATE	Quantity	Cost/Item	Cost	Item	Description
12/31/13	58	\$1.50	\$87.00	LEXIS/NEXIS	Lexis/Nexis Databases Legal Research to date.
12/31/13	1	\$1.78	\$1.78	POSTAGE	Postage Paid December 2013
01/13/14	1	\$98.00	\$98.00	SUBPOENA FEE	Subpoena Service Paul Ober re: Ober & Associates
01/13/14	1	\$15.00	\$15.00	SUBPOENA FEE	Subpoena Service Ober & Associates re: Ober & Associates Same Address
12/30/13	1	\$400.00	\$400.00	FILING FEE	Filing Fee- Complaint Filed Clerk - U. S. District Court
01/15/14	123	\$1.50	\$184.50	LEXIS/NEXIS	Lexis/Nexis Databases Legal Research to date.
TOTAL			\$786.28		

EXHIBIT “F”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARISSA CHAMURAS, ON BEHALF OF HERSELF AND ALL OTHERS SIMILARLY SITUATED,)	
)	
)	
Plaintiffs)	
v.)	Civil Action No.: 5:13-cv-07634
)	Honorable James Knoll Gardner
PAUL R. OBER & ASSOCIATES and PAUL R. OBER,)	
)	
)	
Defendants)	
)	

**AFFIDAVIT OF JOSHUA P. RUBINSKY, ESQ.,
LEAD COUNSEL FOR PLAINTIFF**

I, Joshua P. Rubinsky, Esquire, being duly sworn according to law, hereby depose and say that:

1. I am lead counsel for Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth in this affidavit.
2. I have practiced in the employment and labor law area since graduating from Temple University School of Law in 1986. I am admitted to practice in Pennsylvania state courts, the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Western District of Pennsylvania, the United States Court of Appeals for the Third Circuit, the United States Supreme Court, and the Court of International Trade.
3. Prior to receiving my law degree, I was the Director of the Center for Fair Employment, a non-profit organization established to provide advice and assistance to employees in labor and employment matters. During my ten-year tenure with the Center for Fair Employment, I assisted in providing legal representation to employees affected by plant closures, plant consolidations, discharges, disciplinary issues, unpaid wages as well as assisting employees obtaining

information related to their ERISA benefits. My specific experience with the Center included assisting individuals, employees and employee groups in employment-related matters before the United States Department of Labor, Pennsylvania Human Relations Commission, Office of Employment Security, Social Security Administration, Merit Systems Protection Board, Equal Employment Opportunity Commission, and National Labor Relations Board.

4. Upon admission to the Pennsylvania bar in 1986, I established a private practice emphasizing labor and employment law, ERISA, and wage claims. In 1991, I merged my practice with attorney Michael Brodie, becoming a partner in Brodie & Rubinsky. The law firm specialized in labor and employment law.

5. From 1991 to the present, my firm has represented individuals, class action Plaintiffs, non-profit organizations, employee organizations and unions. The firm frequently represents large groups of individuals. Our office regularly represents area unions in litigation in Pennsylvania state and federal Courts, and before various administrative agencies. In addition, members of the firm regularly act as advocates in labor arbitrations.

6. In the past, I served as lead counsel in numerous major cases including class action claims. In Honeywell, Inc., and Local 116, 318 NLRB No. 78 (8/25/95), I successfully represented a union on behalf of over 400 employees who were discriminated against on the basis of their union membership. In Trojan Yacht, 319 NLRB No. 97 (11/24/95), I successfully represented a union on behalf of over 300 employees whose pension plans were terminated in violation of certain collective bargaining rights.

7. I also served as co-counsel in Stadler, et al., v. McCulloch, et al., Case No. 93-cv-3093, an ERISA-wage claim filed in Federal and State court on behalf of approximately 100 former employees of Nutri-System. In McManus v. Commonwealth of Pennsylvania Department of

Labor and Industry, Case No. 94-cv-3038, I served as co-counsel in a class action on behalf of Pennsylvania Workers Compensation Judges alleging various constitutional violations. In Ben Seigler, et al., v. Falcon Associates, et al., Case No. 95-cv-2414, I served as lead counsel on a WARN Act claim. A class of approximately 300 former employees of Falcon was certified for settlement purposes.

8. I have served as lead counsel in a number of wage class and collective actions, of which the following are representative: Lemons, et al., v. Triage, et al., Case No. 93-CV-3013; King, et al., v. SEPTA, Case No. 95-cv-0682 (E.D. Pa.); Bynoe v. Atlantic Express Transportation Corp., et al., Case No. 99-cv-4920 (E.D. Pa.); Peter Giordano v. Pep Boys, Case No 99-cv-1281, (E.D. Pa.)¹; Peggy Crocker, et al, v Edens Corporation, Case No. 00-cv-1732 (E.D. Pa.); the American Appliance and Rowland Bankruptcy Cases (N.J. Bankruptcy Case No. 01-14425 JHW); Madison v. RHD, Case No. 97-cv-7402 (E.D. Pa.) - Case No. 9801-2755²; Rayvon Sapp, et al., v. Carol Ann Weisenfeld, et al., Case No. 002428 (Philadelphia Court of Common Pleas); Glenn Johnson, et al., v. King Paratransit Services, Inc., Case No. 00-cv-5537 (E. D. Pa.); Anna Thomas, et al., v. Total Health Home Care Corporation, et al., Case No. 002493 (Philadelphia Court of Common Pleas); Rios, et al., v. Berkshire Building Systems, Inc., et al., Case No. 07-cv-0503 (E.D. Pa.); Ronald Rooney, et al., v. PC Helps Support, LLC, et al., Case No. 08-cv-2093 (E.D. Pa.); Clarke, et al., v. Aramark, et al., Case No. 08-cv-2598 (E.D. Pa.); Reyes, et al., v. Lynch Community Homes, Inc., Case No. 23906 September Term 2007 (Montgomery County Court of Common Pleas); and Anatoliy Neymer , et al., v. Philadelphia Coach, et al.; Case No.103799 (Philadelphia Court of Common Pleas); Backus et al. v. Unlimited Staffing

¹Companion case in Philadelphia Court of Common Pleas.

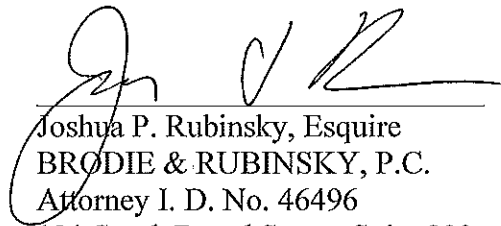
²Companion case in Philadelphia Court of Common Pleas.

Solutions, Inc., Case No. 08-00339 (Montgomery County Court of Common Pleas); Olsen v. Sodexo, Inc., Case No. 2010-C-6112 (Lehigh County Court of Common Pleas); Kearney v. First Transit, Inc., Case No. 12-149 (E.D. Pa.). All of these cases were litigated and settled under the Fair Labor Standards Act, Pennsylvania Wage Payment Collection Law, and/or Pennsylvania Minimum Wage Act.

9. All services for which fees are requested were reasonable and necessary to the prosecution and successful settlement of this class action. Plaintiff's attorneys' hourly rates are reasonable and customary in Philadelphia. All expenses accrued were necessary and reasonable.

10. I was assisted in this litigation primarily by my associates Amy Galer, Esquire and Brian Dilks-Brotman, Esquire, and by law clerks and paralegals from my firm. As lead counsel, I assigned and supervised all work done by my office.

I verify that the facts set forth in this affidavit are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.



Joshua P. Rubinsky, Esquire
BRODIE & RUBINSKY, P.C.
Attorney I. D. No. 46496
121 South Broad Street, Suite 800
Philadelphia, PA 19107
(215) 925-1470
Attorney for Plaintiff

Dated: February 25, 2014

EXHIBIT “G”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARISSA CHAMURAS, ON BEHALF OF
HERSELF AND ALL OTHERS SIMILARLY
SITUATED,**

Plaintiffs

V.

**PAUL R. OBER & ASSOCIATES and
PAUL R. OBER,**

Defendants

Civil Action No.: 5:13-cv-07634
Honorable James Knoll Gardner

**AFFIDAVIT OF AMY E. GALER, ESQ.,
CO-COUNSEL FOR PLAINTIFF**

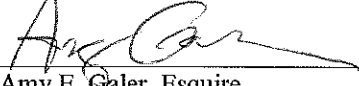
I, Amy E. Galer, Esquire, being duly sworn according to law, hereby depose and say that:

1. I am Co-Counsel for Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth in this affidavit.
2. I have practiced in the employment and labor law area since graduating from Temple University School of Law in 2008. I am admitted to practice in Pennsylvania state courts and the United States District Court for the Eastern District of Pennsylvania.
3. Prior to receiving my law degree, I was employed in a various managerial and financial capacities by a number of different small businesses, where my responsibilities included processing payroll, managing benefits, tax and regulatory compliance, and financial accounting through monthly operating statements.
4. I have served as law clerk and then Counsel on the following Wage Class Action Cases *Anna Thomas, et al., v. Total Health Home Care Corporation, et al.*; Case No. 002493 (Philadelphia C.C.P.); *Rios, et al., v. Berkshire Building Systems, Inc., et al.*, No. 07-cv-0503 (E.D. Pa.); *Neymer, et al. v. Philadelphia Coach, Inc., et al.*, No. 3799 January Term 2008 (Philadelphia County C.C.P.); *Ronald Rooney, et al., v. PC Helps Support, LLC, et al.*, Case No. 08-cv-2093 (E.D. Pa.); *Ronald Rooney, et al., v. PC Helps*

Support, LLC, et al., No. 08-07250 March Term 2008 (Montgomery County C.C.P.);
Clarke, et al., v. Aramark, et al., No. 08-cv-2598 (E.D. Pa.); *Olsen, et al. v. Sodexo, Inc., et al.*, No. 2010-C-6112 (Lehigh County C.C.P.); *John Timothy Kearney, et al. v. First Transit, Inc., et al.*; Case No. 2:12-CV-00149-TJS (E.D.Pa.); *Moore, et al. v. Courtland II, Inc., et al.*, No. 002154 October Term 2011 (Philadelphia County C.C.P.); and *Backus, et al. v. Unlimited Staffing Solutions, Inc., et al.*, No. 08-00339, (Montgomery County C.C.P.).

5. I am currently Counsel on the following Wage Class Action Cases: *Bishop, et al., v. Lee's Industries, Inc.*, No. 1937 December Term 2007 (Philadelphia County C.C.P.); *Neymer v. Art of Life*, No. 02240 June Term 2010 (Philadelphia County C.C.P.); *Hernandez, et al. v. Ashley Furniture Industries, Inc., et al.*, Civil Action No. 10-5459 (E.D. Pa.); and *Diabate, et al. v. MV Transportation, Inc.*, No. 2:14-cv-00857-NIQA (E.D. Pa.).
6. All services for which fees are requested were reasonable and necessary to the prosecution and successful settlement of this class action. All duplicative, unsuccessful or unnecessary time charges have been deleted. Plaintiff's attorneys' hourly rates are reasonable and customary in Philadelphia. All expenses accrued were necessary and reasonable.

I verify that the facts set forth in this affidavit are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.


Amy E. Galer, Esquire
BRODIE & RUBINSKY, P.C.
Attorney I. D. No. 209414
121 South Broad Street, Suite 800
Philadelphia, PA 19107
(215) 925-1470
Attorney for Plaintiff

Dated: February 25, 2014

EXHIBIT “H”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARISSA CHAMURAS, ON BEHALF OF
HERSELF AND ALL OTHERS SIMILARLY
SITUATED,**

Plaintiffs

v.

**PAUL R. OBER & ASSOCIATES and
PAUL R. OBER,**

Defendants

)
)
)
)
)
) **Civil Action No.: 5:13-cv-07634**
) **Honorable James Knoll Gardner**
)
)
)
)
)
)

**AFFIDAVIT OF BRIAN DILKS-BROTMAN, ESQ.,
CO-COUNSEL FOR PLAINTIFF**

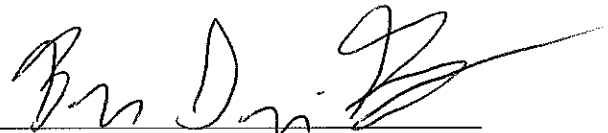
I, Brian Dilks-Brotman, Esquire, being duly sworn according to law, hereby
depose and say that:

1. I am Co-Counsel for Plaintiff in the above-captioned matter and have personal knowledge of the facts set forth in this affidavit.
2. I have practiced in the employment and labor law area since graduating from Rutgers-Camden School of Law in 2011. I am admitted to practice in New Jersey state courts, Pennsylvania state courts, and the United States District Court for the Eastern District of Pennsylvania.
3. I have served as Co-Counsel on the following Wage Class Action Cases: Natrina Moore, et al., v. Courtland II, et al.; Case No. 002154 (Philadelphia Court of Common Pleas); and John Timothy Kearney, et al. v. First Transit, Inc., et al.; Case No. 2:12-CV-00149-TJS (E.D.Pa.).
4. I am currently serving as Co-Counsel in the following Wage Class Action cases: *Bishop et al. v. Lee's Industries, Inc.*, No. 1937 December Term 2007

(Philadelphia County C.C.P.); and *Diabate et al. v. MV Transportation, Inc.*, No. 2:14-cv-00857-NIQA (E.D. Pa.).

5. I am additionally serving as Co-Counsel representative of current and former employee creditors in The Matters of Art of Life, Inc., Substantially Consolidated with Advanced Life Support Ambulance, Inc.; Case No. 12-10596/mdc (U.S. Bankruptcy Court, E.D.Pa.).
6. All services for which fees as requested were reasonable and necessary to the prosecution and successful settlement of this class action. Plaintiff's attorneys' hourly rates are reasonable and customary in Philadelphia. All expenses accrued were necessary and reasonable.

I verify that the facts set forth in this affidavit are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.



Brian Dilks-Brotman, Esquire
BRODIE & RUBINSKY, P.C.
Attorney I. D. No. 312024
121 South Broad Street, Suite 800
Philadelphia, PA 19107
(215) 925-1470
Attorney for Plaintiff

Dated: February 25, 2014

EXHIBIT “I.1”



Published on *Community Legal Services of Philadelphia* (<http://clsphila.org>)

[Home](#) > [About CLS](#) > Attorney Fees

Attorney Fees

Explanatory Notice to the Public

CLS never charges attorney's fees to its clients, although in some cases clients are asked to pay for court filing fees or other out of pocket expenses.

The attached chart lists the fee schedule used by CLS only in cases in which the law allows for the award of attorney's fees from opposing parties in order to compensate CLS for the legal services provided to its clients.

RANGE OF HOURLY RATES*, Effective June 23, 2011

Attorneys post-law school experience under 2 years	\$165-190
Attorneys 2-5 year's experience	\$180-225
Attorneys 6-10 year's experience	\$225-255
Attorneys 11-15 year's experience	\$260-335
Attorneys 16-20 year's experience	\$305-350
Attorneys 21-25 year's experience	\$325-370
Attorneys more than 25 year's experience	\$360-460
Law Students	\$80-135
Paralegal I and II	\$80-100
Senior and Supervisory Paralegal	\$100-135

*These rates do not reflect any adjustment for contingency, and are based on Philadelphia law firm market survey data and increases in the Consumer Price Index.

THESE FEES ARE NOT CHARGED TO CLS CLIENTS. SEE NOTICE ABOVE.

EXHIBIT “I.2”

THE SURVEY OF LAW FIRM ECONOMICS, 2010 EDITION

Metropolitan Area Report
for

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD

Published by:

ALM LEGAL INTELLIGENCE

120 Broadway, 5th Floor

New York, NY 10271-1101

(P) 1-888-770-5647

(F) 646-822-5326

**CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
INDIVIDUAL STATUS CODES
STANDARD HOURLY BILLING RATES
As of January 1, 2010**

Metro Analysis	Number of Offices	RATE					
		Number of Lawyers	Average \$	Lower Quartile \$	Median \$	Upper Quartile \$	Ninth Decile \$
Equity Partner/Shareholder	14	132	447	376	425	520	570
Non-Equity Partner	13	104	384	330	380	435	460
Associate Lawyer	14	123	253	220	250	275	325
Staff Lawyer	3	6	—	—	—	—	—
Of Counsel	8	16	374	—	363	—	—

**CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
YEAR ADMITTED TO BAR
STANDARD HOURLY BILLING RATES
As of January 1, 2010**

Metro Analysis	Number of Offices	RATE					
		Number of Lawyers	Average \$	Lower Quartile \$	Median \$	Upper Quartile \$	Ninth Decile \$
Before 1965	4	4	—	—	—	—	—
1965 - 1969	5	9	469	—	—	—	—
1970 - 1974	8	28	454	376	433	550	577
1975 - 1979	11	42	469	404	475	540	575
1980 - 1984	9	38	410	369	400	435	521
1985 - 1989	11	41	420	353	420	505	537
1990 - 1994	12	44	380	330	370	435	480
1995 - 1999	10	50	336	279	325	396	435
2000 - 2004	13	56	271	226	260	304	350
2005 - 2007	6	41	227	185	225	250	275
2008	4	7	—	—	—	—	—
2009	4	4	—	—	—	—	—

CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
YEARS OF LEGAL EXPERIENCE
STANDARD HOURLY BILLING RATES
As of January 1, 2010

Metro Analysis	Number of Offices	Number of Lawyers	Average \$	RATE			
				Lower Quantile \$	Median \$	Upper Quantile \$	Ninth Decile \$
Under 2 Years	8	11	211	—	215	—	—
2 or 3 Years	5	22	210	175	220	225	244
4 or 5 Years	5	25	240	213	250	270	281
6 or 7 Years	8	24	252	214	258	279	303
8 to 10 Years	11	37	297	243	295	333	373
11 to 15 Years	11	47	355	295	350	420	451
16 to 20 Years	10	43	380	330	370	425	481
21 to 30 Years	13	87	431	365	420	510	550
31 or More Years	10	68	458	395	445	539	575

CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
INDIVIDUAL STATUS CODES
ANNUAL CLIENT (BILLABLE) HOURS WORKED

Metro Analysis	Number of Offices	HOURS					
		Number of Lawyers	Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
Equity Partner/Shareholder	12	119	1,638	1,314	1,637	1,910	2,192
Non-Equity Partner	13	66	1,675	1,301	1,723	1,917	2,253
Associate Lawyer	10	92	1,792	1,623	1,814	1,988	2,159
Staff Lawyer	1	3	--	--	--	--	--
Of Counsel	7	7	1,528	--	--	--	--

CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
YEAR ADMITTED TO BAR--Partners/Shareholders (Equity/Non-Equity)
ANNUAL CLIENT (BILLABLE) HOURS WORKED

Metro Analysis	Number of Offices	HOURS					
		Number of Lawyers	Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
Before 1965	1	1	--	--	--	--	--
1965 - 1969	4	5	--	--	--	--	--
1970 - 1974	8	23	1,424	1,203	1,314	1,614	1,985
1975 - 1979	11	32	1,663	1,324	1,687	1,966	2,182
1980 - 1984	8	29	1,477	1,181	1,351	1,764	2,064
1985 - 1989	9	34	1,698	1,385	1,723	1,915	2,274
1990 - 1994	10	31	1,799	1,641	1,837	1,988	2,265
1995 - 1999	7	25	1,832	1,600	1,835	2,052	2,434
2000 - 2004	4	4	--	--	--	--	--

CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
 YEAR ADMITTED TO BAR--Associate/Staff Lawyers
 ANNUAL CLIENT (BILLABLE) HOURS WORKED

Metro Analysis	Number of Offices	HOURS					
		Number of Lawyers	Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
1970 - 1974	1	1	--	--	--	--	--
1975 - 1979	1	1	--	--	--	--	--
1980 - 1984	1	1	--	--	--	--	--
1985 - 1989	1	1	--	--	--	--	--
1990 - 1994	2	2	--	--	--	--	--
1995 - 1999	6	11	1,843	--	1,867	--	--
2000 - 2004	9	36	1,749	1,623	1,780	1,961	2,128
2005 - 2007	6	36	1,824	1,668	1,857	2,006	2,170
2008	3	6	--	--	--	--	--

**CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
INDIVIDUAL STATUS CODES
TOTAL COMPENSATION**

Metro Analysis	Number of Offices	TOTAL COMPENSATION					
		Number of Lawyers	Average \$	Lower Quartile \$	Median \$	Upper Quartile \$	Ninth Decile \$
Equity Partner/Shareholder	14	125	503,255	309,514	421,413	567,216	850,040
Non-Equity Partner	13	70	250,199	206,529	233,212	274,134	360,000
Associate Lawyer	11	94	156,412	142,165	157,338	177,450	189,077
Staff Lawyer	2	4	—	—	—	—	—
Of Counsel	7	8	168,697	—	—	—	—

**CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
YEAR ADMITTED TO BAR--Partners/Shareholders (Equity/Non-Equity)
TOTAL COMPENSATION**

Metro Analysis	Number of Offices	TOTAL COMPENSATION					
		Number of Lawyers	Average \$	Lower Quartile \$	Median \$	Upper Quartile \$	Ninth Decile \$
Before 1965	2	2	--	--	--	--	--
1965 - 1969	6	6	--	--	--	--	--
1970 - 1974	8	25	461,566	278,925	398,139	619,149	917,385
1975 - 1979	11	34	621,038	375,337	515,510	681,498	1,142,850
1980 - 1984	9	31	403,158	260,000	371,665	456,000	713,657
1985 - 1989	10	35	416,128	271,534	370,692	498,180	721,620
1990 - 1994	10	32	334,049	233,319	278,379	330,378	523,911
1995 - 1999	7	25	248,829	221,018	243,950	272,855	308,947
2000 - 2004	4	4	--	--	--	--	--
2005 - 2007	1	1	--	--	--	--	--

**CORE BASED STATISTICAL AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
YEAR ADMITTED TO BAR--Associates/Staff Lawyers
TOTAL COMPENSATION**

Metro Analysis	Number of Offices	TOTAL COMPENSATION					
		Number of Lawyers	Average \$	Lower Quartile \$	Median \$	Upper Quartile \$	Ninth Decile \$
1970 - 1974	2	2	--	--	--	--	--
1975 - 1979	1	1	--	--	--	--	--
1980 - 1984	1	1	--	--	--	--	--
1985 - 1989	1	1	--	--	--	--	--
1990 - 1994	3	3	--	--	--	--	--
1995 - 1999	6	11	177,489	--	177,329	--	--
2000 - 2004	10	37	161,222	143,967	161,014	180,604	201,075
2005 - 2007	6	36	145,893	128,864	150,360	164,854	180,531
2008	3	6	--	--	--	--	--

**CORE BASED STATISTICAL
AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
PARTICIPANTS BY SIZE OF FIRM
BILLING RATE ANALYSIS**

	Number of Firms	Percent of Firms
9 to 20 Lawyers	1	12.5%
41 to 75 Lawyers	1	12.5%
76 to 150 Lawyers	2	25.0%
Over 150 Lawyers	4	50.0%
Total	8	100.0%

**CORE BASED STATISTICAL
AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
PARTICIPANTS BY SIZE OF FIRM
BILLABLE HOURS ANALYSIS**

	Number of Firms	Percent of Firms
41 to 75 Lawyers	1	14.3%
76 to 150 Lawyers	2	28.6%
Over 150 Lawyers	4	57.1%
Total	7	100.0%

**CORE BASED STATISTICAL
AREA--Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
PARTICIPANTS BY SIZE OF FIRM
COMPENSATION ANALYSIS**

	Number of Firms	Percent of Firms
9 to 20 Lawyers	1	12.5%
41 to 75 Lawyers	1	12.5%
76 to 150 Lawyers	2	25.0%
Over 150 Lawyers	4	50.0%
Total	8	100.0%

EXHIBIT “J”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARISSA CHAMURAS, ON BEHALF OF
HERSELF AND ALL OTHERS SIMILARLY
SITUATED,**

Plaintiffs

V.

**PAUL R. OBER & ASSOCIATES and
PAUL R. OBER,**

Defendants

)
)
)
)
)
) **Civil Action No.: 5:13-cv-07634**
) **Honorable James Knoll Gardner**
)
)
)
)
)
)

DECLARATION OF ALICE W. BALLARD

1. I am Alice W. Ballard, Esquire. I submit this Declaration in support of the Petition of Joshua P. Rubinsky for an award of attorneys' fees in the above-captioned matter.

2. I am a 1973 graduate of Harvard Law School.

3. In 1974, I became a staff attorney at the Philadelphia Office of the Lawyers' Committee for Civil Rights (which subsequently became the Public Interest Law Center of Philadelphia), where I worked until May of 1976, at which time, I and two partners formed the law firm of Samuel, Ballard and Hyman, P.C. I am presently the owner and principal attorney in the Law Office of Alice W. Ballard, P.C.

5. From 1975 until the present, I have focused my professional efforts almost exclusively on the litigation of claims brought by employees against their employers and/or their unions. I have handled hundreds of employment rights cases, including class actions, many of which have gone to trial and appeal.

6. I served as an adjunct professor at Villanova Law School teaching Employment Discrimination, and at Penn Law School teaching Trial of an Issue of Fact. I also serve frequently as a presenter at educational programs for attorneys in the field of employment rights.

7. I served on the Third Circuit Task Force on Rule 11, and I was a member of the Civil Justice Reform Act Advisory Committee for the Eastern District of Pennsylvania. I have twice been an invited speaker at the Third Circuit Judicial Conference, and I was an Employment Law consultant to the Pennsylvania Courts' 2006 project to revise the Pennsylvania Standard Jury Instructions. I currently serve as an Adviser to the American Law Institute's Restatement (Third) of Employment Law.

8. I am an active member of the National Employment Lawyers Association, both locally and nationally, and a member of NELA's National Litigation Strategy Taskforce on Summary Judgment. Through my work with NELA and its members, I am familiar with the hourly rates charged by plaintiff-side practitioners in employment rights litigation in the Delaware Valley.

9. My hourly rate for both contingent and non-contingent employment rights litigation is currently \$500 per hour.

10. I have reviewed the Affidavit of Joshua Rubinsky, Esquire, in support of his fee petition in this case. I am also personally aware of Mr. Rubinsky's excellent work and strong reputation in the community. In my opinion, Mr. Rubinsky's requested rate of \$475 per hour is entirely reasonable and appropriate in the context of the local market for this kind of litigation.

12. I have reviewed the background and credentials of Amy Galer, Esquire, as well as her summary of the work she performed in this case. In my opinion, Ms. Galer's requested rate of \$295 per hour is reasonable and appropriate in the context of the local market for this kind of litigation, especially considering that Ms. Galer was working in tandem with Mr. Rubinsky, who is a seasoned and skilled practitioner. Although Ms. Galer is a 2008 law school graduate, her many years of prior experience working in financial, payroll, and human resources capacities for small firms adds significantly to the value to value of her time spent on cases such as this one.

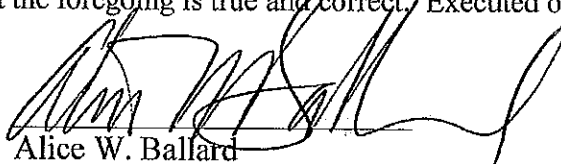
The foregoing facts are true and correct to the best of my knowledge and information.



ALICE W. BALLARD

VERIFICATION

I verify under penalty of perjury that the foregoing is true and correct. Executed on February 24, 2012.



Alice W. Ballard